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## MEMO ENDORSED

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TERRA TOWERS CORP., TBS MANAGEMENT, S.A., and DT HOLDINGS, INC.,

Petitioners,

V.

TELECOM BUSINESS SOLUTION, LLC, LATAM TOWERS, LLC, and AMLQ HOLDINGS (CAY) LTD.,

Respondents.

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No. 22-cv-07301-LAK

Pursuant to 59(e) of the Federal Rules of Civil Procedure, Petitioners Terra Towers Corp., TBS Management, S.A. (together, "Terra"), and DT Holdings, Inc. ("DTH"), respectfully moves to alter or amend the judgment entered on February 21, 2024, denying Petitioners' amended petition to disqualify the arbitral panel (DE 59), and for other and further relief as the Court deems just and proper. In support, Terra/DTH submits their Memorandum of Law dated March 19, 2024, and a Declaration in Support, which are being filed contemporaneously with this motion.

Dated: Miami, FL

March 19, 2024

Respectfully submitted,

CAREY RODRIGUEZ LLP

By: <u>/s/ Juan J. Rodriguez</u> Juan J. Rodriguez\*

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## Memorandum Endorsement Telecom Bus. Sol. LLC v. Terra Towers Corp., 22-cv-07301 (LAK)

Petitioners' motion for reconsideration (Dkt 60) is denied substantially for the reasons stated in respondents' opposition (Dkt 66).

SO ORDERED.

Dated:

May 1, 2024

Lewis A. Kaplan

United States District Judge